

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA
WESTERN DIVISION

Energy Transfer Equity, L.P., *et al.*

Plaintiffs,

v.

Case No. 1:17-cv-173

Greenpeace International
(aka “Stichting Greenpeace Council”), *et al.*

Defendants.

**DEFENDANT KRYSTAL TWO BULLS’ RESPONSE TO PLAINTIFFS’ MOTION FOR
EXTENSION OF TIME TO SERVE**

On December 19, 2018, Plaintiffs moved for a second extension of time to serve Defendants Jessica Reznicek, Ruby Montoya, and Cody Hall. Dkt. 118. In support of that Motion, Plaintiffs submitted a declaration – from their counsel, Jennifer Recine – which includes the materially false statement that “Ms. Two Bulls acknowledged that she had been evading service.” Dkt. 120 at ¶ 4. Ms. Two Bulls has already explained that she did not evade or attempt to evade service. Dkt. 121 at 18-23; Dkt. 121-1. And, contrary to Ms. Recine’s false statement, Ms. Two Bulls has never admitted to evading service.

Ms. Two Bulls was served on December 5, 2018 at the Phoenix airport. Two Bulls Decl. at ¶ 3. She had a short conversation with the process server, wherein the process server apologized several times for serving her, and Ms. Two Bulls told the process server there was no need to apologize because she expected to be served. Ms. Two Bulls did not make any statements suggesting that she had been attempting to evade service. Two Bulls Decl. at ¶ 3.

It is false or grossly misleading to suggest, as Ms. Recine did, that Ms. Two Bulls’ expectation

of service (based on knowledge that she was a defendant in this litigation) was an admission that she was evading service. This is just another in a long string of misrepresentations by these Plaintiffs.

Dated: January 2, 2019

Respectfully submitted,

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